

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Court File No. CR-21-93 (JRT/TNL)

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United States of America,  
Plaintiff,

v.

Robbin Allen Thomas,  
Defendant.

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**Motion to Suppress Evidence Obtained  
by Search and Seizure**

On February 19, 2021, Deputy Arcand with the Anoka County Sheriff's Office initiated a traffic stop of a truck being driven by Robbin Thomas. At the time of the stop, the truck was located in the driveway of a private residence in Ham Lake, Anoka County, Minnesota. The deputy ultimately performed a warrantless search of the truck, resulting in the discovery of a number of items, including suspected methamphetamine, suspected marijuana and a handgun.

Based largely on the evidence seized from the truck, deputies applied for and obtained a warrant to search the residence. A number of items were seized from the home, including suspected narcotics.

Pursuant to Fed. R. Evid. 12(b)(3)(C), Defendant Robbin Allen Thomas hereby moves the Court for an order suppressing the evidence seized from the truck and the evidence seized from the home. The grounds for the motion are:

- The stop was not supported by reasonable articulable suspicion.

- The deputy did not have a warrant to search the truck and no exception to the warrant requirement applied.
- The search warrant affidavit failed to establish a nexus between the place to be searched and the items sought.

This motion is based upon evidence to be adduced at the Motions Hearing and such additional arguments and authorities as may be submitted thereafter.

Respectfully submitted,

Dated: September 8, 2021

/s/ F. Clayton Tyler  
F. Clayton Tyler (11151X), [fctyler@fctyler.com](mailto:fctyler@fctyler.com)  
F. Clayton Tyler, P.A.  
331 Second Avenue South, Suite 230  
Minneapolis, MN 55401  
Ph: 612-333-7309  
Fax: 612-333-5919  
Attorney for Defendant